



K. Chad Burgess
Director & Deputy General Counsel

chad.burgess@scana.com

April 23, 2018

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29211

RE: Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Incorporated for Review and Approval of a Proposed Business Combination between SCANA Corporation and Dominion Energy, Incorporated, as May Be Required, and for a Prudency Determination Regarding the Abandonment of the V.C. Summer Units 2 & 3 Project and Associated Customer Benefits and Cost Recovery Plans
Docket No. 2017-370-E

Dear Ms. Boyd:

Enclosed for filing, on behalf of South Carolina Electric & Gas Company and Dominion Energy, Inc. (collectively, "Joint Applicants") is a copy of the Joint Applicants' First Set of Discovery Requests which was served on the South Carolina Office of Regulatory Staff today.

By copy of this letter, we are serving the parties of record in the above-captioned docket with a copy of the First Set of Discovery Requests. For those parties of record who have executed the "Agreement for Electronic Service" we are serving a copy the First Set of Discovery Requests via electronic mail. For those parties of record who have not executed this agreement we are serving those parties via U.S. First Class Mail.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

K. Chad Burgess

KCB/kms
Enclosures

cc: Shannon Bowyer Hudson, Esquire
Jeffrey M. Nelson, Esquire
Robert Guild, Esquire
Frank R. Ellerbe, III, Esquire
John H. Tiencken, Jr., Esquire
W. Andrew Gowder, Jr., Esquire
Michael N. Couick, Esquire
Christopher R. Koon, Esquire
Robert E. Tyson, Jr., Esquire
Scott Elliott, Esquire
Elizabeth Jones, Esquire
J. Emory Smith, Jr.
Richard L. Whitt, Esquire
James R. Davis, Esquire
John B. Coffman, Esquire
Emily E. Medlyn, Esquire
Matthew T. Richardson, Esquire
(all via electronic service only w/enclosures)

Camden N. Massingill, Esquire
Susan B. Berkowitz, Esquire
Stephanie U. Eaton, Esquire
Jenny R. Pittman, Esquire
Alexander G. Shissias, Esquire
William T. Dowdey
Christopher S. McDonald, Esquire
Damon E. Xenopoulos, Esquire
Derrick P. Williamson Esquire
J. Blanding Holman, IV, Esquire
Frank Knapp, Jr.
Lynn Teague
Robert D. Cook, Esquire
Michael T. Rose, Esquire
Lara B. Brandfass, Esquire
Wallace K. Lightsey, Esquire
Timothy S. Rogers, Esquire

Michael J. Anzelmo, Esquire
James N. Horwood, Esquire
Stephen C. Pearson, Esquire
William C. Cleveland, Esquire
Dino Teppara, Esquire

William C. Hubbard
Peter J. Hopkins, Esquire
Jessica R. Bell, Esquire
James F. Walsh, Jr., Esquire

(all via U.S. First Class Mail and electronic service w/enclosures)



K. Chad Burgess
Director & Deputy General Counsel

chad.burgess@scana.com

April 23, 2018

VIA ELECTRONIC MAIL ONLY

Shannon Bowyer Hudson, Esquire
Jeffrey M. Nelson, Esquire
Jenny R. Pittman, Esquire
South Carolina Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201

**RE: Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Incorporated for Review and Approval of a Proposed Business Combination between SCANA Corporation and Dominion Energy, Incorporated, as May Be Required, and for a Prudency Determination Regarding the Abandonment of the V.C. Summer Units 2 & 3 Project and Associated Customer Benefits and Cost Recovery Plans
Docket No. 2017-370-E**

Dear Counsel:

Enclosed for service upon the South Carolina Office of Regulatory Staff ("ORS") is a copy of South Carolina Electric & Gas Company and Dominion Energy, Inc.'s First Set of Discovery Requests to the ORS.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

K. Chad Burgess

KCB/kms
Enclosures

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA
DOCKET NO. 2017-370-E

In Re: Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., as may be required, and for a prudency determination regarding the abandonment of the V.C. Summer Units 2 & 3 Project and associated customer benefits and cost recovery plan.

**SOUTH CAROLINA ELECTRIC & GAS
COMPANY AND DOMINION ENERGY,
INC.'S FIRST SET OF DISCOVERY
REQUESTS**

TO: JEFFREY M. NELSON, ESQ., SHANNON BOWYER HUDSON, ESQ., JENNY PITTMAN, ESQ, ATTORNEYS FOR THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF

Pursuant to 10 S.C. Code Regs. 103-833 and 103-835, Rules 33 and 34 of the South Carolina Rules of Civil Procedure, South Carolina Electric & Gas Company ("SCE&G") and Dominion Energy, Inc. ("Dominion Energy") (together, "Joint Applicants"), by and through its undersigned counsel, hereby propounds the following Interrogatories and Requests for Production to the South Carolina Office of Regulatory Staff ("ORS") and requests responses in writing and under oath be served on the undersigned or before May 14, 2018. If you are unable to respond to any of the requests, or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

DEFINITIONS AND INSTRUCTIONS

1. Joint Applicants' Interrogatories and Requests for Production to Intervenor are to be read and interpreted in accordance with the Definitions and Instructions set forth herein.

2. The terms “ORS,” “you,” and “your” shall mean ORS and any of its agents, employees, attorneys, accountants, consultants, and any other individual or entity associated or affiliated with ORS, purporting to act on ORS’s behalf with respect to any matter at issue in the above-captioned action.

3. The term “Documents” is defined to be synonymous in meaning and equal in scope to the usage of the term in Rules 33 and 34 of the South Carolina Rules of Civil Procedure. This term encompasses all written, recorded, and stored information in your possession, under your control, available at your request, and information which can be located or discovered by reasonably diligent efforts, as well as written, recorded, and stored information in the possession of, under the control of, or available at the request of any of your agents or attorneys. The term Documents as used herein includes, without limitation, any writing or record of any kind, and includes digital data and other data (including metadata) stored on computers or other electronic devices, all writings and amendments of any kind including the originals and non-identical copies whether different from the original by reason of any notation made on such copies or otherwise, including, without limitation, all written communications, letters, emails, correspondence, memoranda, notes, records, business records, photographs, videotape or audiotape recordings, contracts, agreements, notations of telephone conversation or personal conversations, diaries, desk calendars, day-timers, to-do lists, reports, computer records, time sheets, data compilations of any type, kind or medium, and materials similar to any of the foregoing, however denominated and to whomever addressed, whether made or received by you.

4. The term “Docket” means Docket No. 2017-370-E, and/or any related docket, including but not limited to Docket No. 2017-305-E and 2017-207-E.

5. If any Document responsive to Joint Applicants' Request for Production is withheld upon a claim of privilege or any other reason, please state for each such document:

- a. The Request number to which the Document is responsive;
- b. Its title and general subject matter;
- c. Its date;
- d. Its author;
- e. The name(s) of the person(s) for whom it was prepared;
- f. The name of every person who has seen the Document;
- g. The nature of the privilege claimed or other basis for withholding; and
- h. The name and address of the person(s) presently having control, custody, or possession of the Document.

6. If information responsive to an Interrogatory is withheld upon a claim of privilege or any other reason, please state for each such Interrogatory:

- a. Identify the Interrogatory;
- b. Provide an explanation as to why the information is privileged or is being withheld;
- c. The name(s) of the person(s) who would provide the information were it not privileged or being withheld;
- d. The name of every person who has the information requested;
- e. The nature of the privilege claimed or other basis for withholding; and
- f. The name and address of the person(s) presently having control, custody, or possession of the information being requested.

7. If any Document responsive to Joint Applicant's Request for Production has been lost, destroyed, or otherwise discarded, please identify each lost, destroyed, or discarded Document and state:

- a. The approximate date of loss, destruction or other disposition;
- b. The reason for destruction or other disposition; and
- c. The name, current addresses, occupation, and employer of the person who lost, destroyed, or disposed of the Document.

PLEASE TAKE NOTICE that Joint Applicants will object at or prior to a hearing to any attempt by ORS to introduce evidence at any hearing which is sought by Joint Applicants' Interrogatories or First Request for Production of Documents as to which no disclosure has been made.

INTERROGATORIES

1. Please give the names and addresses of persons known to ORS or counsel to be witnesses concerning the facts of the case and indicate whether written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.

2. Please provide a list of the witness names ORS intends to call and the subject matter for which each witness intends to testify at the hearing in this matter.

3. Please set forth a list of photographs, plats, sketches or other Documents in possession of ORS that relate to the claims or defenses in this docket.

4. Please list the names and addresses of any expert witnesses whom ORS proposes to use as a witness at the hearing of this Docket.

5. For each person known to ORS or counsel to be a witness concerning the facts of this Docket, set forth either a summary containing the facts known to or observed by such witnesses, or provide a copy of any written or recorded statements taken from such witnesses.

6. Please list all Documents or other evidence on which ORS intends to rely at the hearing of this Docket.

7. Please list all communications, whether written or oral, with ORS since this Petition was filed, including the names of those involved in the communication and the nature of the communication.

8. Identify each individual who answered these interrogatories.

REQUESTS FOR PRODUCTION

1. All Documents you referred to in preparing the answers to Joint Applicants' Interrogatories.

2. All photographs, videotapes, audiotapes, maps, plats, sketches, drawings, diagrams, measurements, surveys, or other Documents or material related in any way to this Docket.

3. All statements of any witnesses, including eyewitnesses or other witnesses, which are in the possession or control of ORS or ORS's attorneys, whether written or otherwise recorded, which ORS may offer into evidence as an exhibit at a hearing in this Docket.

4. All Documents, including, without limitation, any memoranda, notes, reports, correspondence, journals, diaries, photos, video and/or audio recordings, newspaper clippings or recorded print or AV media, or other tangible materials which Intervenor may offer into evidence as an exhibit at a hearing.

5. The report of any expert witness who will testify on your behalf at the hearing of this Docket.

6. All written communications with ORS or any present or former officer or employee of ORS or any intervenor in this Docket since August 1, 2017, related to SCE&G.

7. All other Documents and things that ORS intends to offer into evidence at the hearing of this Docket.

Respectfully submitted,



K. Chad Burgess
Matthew W. Gissendanner
South Carolina Electric & Gas Company
Mail Code C222
220 Operation Way
Cayce, SC 29033
(803) 217-8141 (KCB)
(803) 217-5359 (MWG)
chad.burgess@scana.com
matthew.gissendanner@scana.com

Belton T. Zeigler
Womble Bond Dickinson (US) LLP
1221 Main Street, Suite 1600
Columbia, SC 29201
(803) 454-7720
belton.zeigler@wbd-us.com

Mitchell Willoughby
Willoughby & Hoefer, P.A.
Post Office Box 8416
Columbia, SC 29202
(803) 252-3300
mwilloughby@willoughbyhoefer.com

Attorneys for South Carolina Electric & Gas Company



J. David Black, Esquire
Nexsen Pruet, LLC
1230 Main Street, Suite 700
Columbia, South Carolina 29201
(803) 771-8900
dblack@nexsenpruet.com

Lisa S. Booth
Dominion Energy Services, Inc.
120 Tredegar Street
P.O. Box 26532
Richmond, Virginia 23261-6532
(804) 819-2288 (LSB)
lisa.s.booth@dominionenergy.com

Joseph K. Reid, III
Elaine S. Ryan
McGuireWoods LLP
Gateway Plaza
800 East Canal Street
Richmond, VA 23219-3916
(804) 775-1198 (KR)
(804) 775-1090 (ESR)
jreid@mcguirewoods.com
eryan@mcguirewoods.com

Attorneys for Dominion Energy, Incorporated

Cayce, South Carolina
Date: April 23, 2018

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2017-370-E

IN RE:

Joint Application of South Carolina Electric & Gas)
Company and Dominion Energy, Inc. for review)
and approval of a proposed business combination)
between SCANA Corporation and Dominion)
Energy, Inc., as may be required, and for a prudency)
determination regarding the abandonment of the)
V.C. Summer Units 2 & 3 Project and associated)
customer benefits and cost recovery plans)
_____)


**CERTIFICATE OF
SERVICE**

This is to certify that I caused to be served on April 23, 2018, one (1) copy of the
South Carolina Electric & Gas Company and Dominion Energy, Incorporated's
First Set of Discovery Requests to the South Carolina Office of Regulatory Staff to
the persons named below at the addresses via electronic mail only:

Shannon Bowyer Hudson, Esquire
shudson@regstaff.sc.gov

Jeffrey M. Nelson, Esquire
jnelson@regstaff.sc.gov

Jenny R. Pittman, Esquire
jpittman@regstaff.sc.gov



Karen M. Scruggs

Cayce, South Carolina